

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

§  
§  
§  
§  
§  
§  
§  
§

**No. 1:19-md-2875-RBK  
Hon. Robert Kugler  
Hon. Joel Schneider**

**DECLARATION OF DREW T. DORNER REGARDING  
DEFENDANTS' FIRST AMENDED NOTICE OF  
VIDEOTAPED DEPOSITION TO MAINE AUTOMOBILE DEALERS  
ASSOCIATION, INC. INSURANCE TRUST PURSUANT TO FED. R. CIV. P. 30(B)(6)**

I, Drew T. Dorner, declare as follows:

1. I am counsel to defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S. Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S. LLC ("Defendants") in the above-captioned matter. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. On April 28, 2021, I served Defendants' First Amended Notice of Videotaped Deposition to Maine Automobile Dealers Association, Inc. Insurance Trust Pursuant to Fed. R. Civ. P. 30(b)(6) ("Notice") on counsel for plaintiff Maine Automobile Dealers Association, Inc. Insurance Trust ("MADA").

3. The Notice set forth a start time for the deposition of 10:00 a.m. ET on May 28, 2021.

4. Subsequent to service of the Notice, counsel for MADA and Defendants agreed to change the start time to 8:30 a.m. ET.

5. In lieu of serving a second amended notice of deposition, counsel for Defendants is providing this declaration to inform the Court and all parties to this action of the modified start

time. Defendants' counsel further states that to the best of his knowledge, any attorneys involved in this matter who had expressed their intention to attend MADA's deposition were informed of the earlier start time several days before the filing of the Notice and this declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 27, 2021 at Washington, District of Columbia.

/s/ Drew T. Dorner  
Drew T. Dorner